

REMARKS

Status Summary

Claims 1-23 are pending in the present application. No claims have been canceled and no new claims have been added. Therefore, upon entry of this amendment, claims 1-23 remain pending.

Claim Rejection - 35 U.S.C. § 103

Claims 1-2, 5-9, 15-17, and 20-21 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Application Publication No. 2005/0058061 to Shaffer et al., (hereinafter, "Shaffer") in view of U.S. Patent No. 7,286,545 to Tester et al., (hereinafter, "Tester") and U.S. Patent Application Publication No. 2004/0063499 to Schneider et al., (hereinafter, "Schneider"). This rejection is respectfully traversed.

Independent claim 1 recites a multi-site redundant telephony call processing system that includes an active telephony call processing host located in a first geographic region for controlling calls between telephony subscribers. Claim 1 also recites a standby telephony processing host located in a second geographic region for taking over the call control functions handled by the active telephony call processing host in the event the active telephony call processing host fails. In addition, the claimed system includes at least one local area network (LAN), which is geographically distributed between the first and second geographic regions, is adapted to carry signaling messages to and from the active and standby telephony call processing hosts, wherein the at least one geographically distributed LAN is bridged over a wide area network (WAN). Claim 1 has been amended to clarify that the at least one LAN

includes a first LAN segment and a second LAN segment, and that the at least one LAN is bridged over a WAN by interconnecting the first LAN segment located in a first geographic region with the second LAN segment located in the second geographic region. Moreover, independent claim 15 has been similarly amended to include these elements as well. Support for this amendment is found, for example, on page 4, lines 4-11 of the present application, which states that two LAN segments may be interconnected over a WAN, such that, together, they still form a single LAN. Similarly, page 9, lines 1-9 also states that a single LAN may be distributed between two completely separate sites (i.e., segments), such as site A **102** and site B **106** as shown in Figure 1. Specifically, a particular LAN has a first side/segment located at site A and a second side/segment located at site B. (See page 9, lines 1-3 in the present specification). Interconnection between redundant telephony call processing LAN segments (i.e., site A **102** and site B **106**) can be implemented via bridging over a WAN. Exemplary bridging of a distributed LAN (e.g., LAN1 or LAN 2) via a WAN link is shown in Figure 1.

It is submitted that the combination of Shaffer in view of Tester and Schneider does not mention or suggest at least one LAN that includes a first LAN segment and a second LAN segment, and that the at least one LAN is bridged over a WAN by interconnecting the first LAN segment located in a first geographic region with the second LAN segment located in the second geographic region as recited in claim 1. Rather, Shaffer discloses a telecommunications system that includes a single LAN **101** that is coupled to a variety of H.323 terminals **102a**, **102b**, a primary H.323 gatekeeper

**108a**, a secondary H.323 gatekeeper **108b**, and a number of other devices. There is absolutely no mention or suggestion in Shaffer that LAN **101** is geographically distributed, much less the use of a wide area network (WAN) is to communicatively bridge a first geographic region and a second geographic region of a LAN. The Official Action also indicates this in section 2, which states that Shaffer does not specifically disclose that the processing hosts are geographically distributed. In an attempt to overcome this substantial gap existing between claim 1 and Shaffer, the Official Action introduces Tester which discloses call servers that are geographically distributed in a packet network. Specifically, column 9, lines 24-40 of Tester discloses the notion that backup call servers should be positioned at geographically disparate locations to minimize the impact of call server failures caused by geographic incidents. Applicants submit that Tester, alone or in combination with Shaffer and Schneider, fails to disclose or suggest the geographic distribution recited in claim 1. Specifically, it is submitted that claim 1 recites 1) that the active and standby telephony call processing hosts (which collectively form a single logical telephony call processing node) are located in separate geographic regions, and 2) that the first and second LAN segments of the at least one LAN are geographically distributed between the recited first and second geographic regions. Applicants submit that Tester only discloses that backup servers may be positioned at geographic disparate locations, without disclosing or suggesting that 1) the active and standby servers collectively form a single logical telephony call processing node and 2) a LAN that is geographically distributed between a first LAN segment in a first geographic region and a second LAN segment in a second geographic region. It is

further submitted that Shaffer and Schneider, alone or in combination with Tester, fail to disclose or suggest these two elements as well.

Section 3 of the Official Action states that Shaffer in view of Tester does not disclose a LAN connecting the call processing hosts via a LAN bridged over a WAN. In an attempt to overcome this substantial gap existing between claim 1 and Shaffer in view of Tester, the Official Action introduces Schneider which is alleged to disclose connecting the call processing hosts via a LAN bridged over a WAN. Applicants respectfully disagree. Schneider instead discloses a method for awarding a bonus to a gaming device on a WAN. Portions of the WAN are located at different casinos, wherein each casino includes a separate LAN. (See Schneider, paragraph [0013]). For instance, Figure 1 of Schneider shows a single WAN **12** that serves to connect a plurality of separate LANs **18A-E**. Applicants submit that while Schneider may disclose that WAN **12** serves to connect the individual LANs **18A-E**, there is simply no mention or suggestion in Schneider that at least one LAN is bridged over a WAN by interconnecting a first segment (located in a first geographic region) of the at least one LAN with a second segment (located in a second geographic region) of the same at least one LAN. Notably, claim 1 recites that a LAN is separated into two segments, wherein the two segments are respectively located in two different geographic locations. At best, Schneider discloses or suggests a plurality of separate and distinct LANs that are bridged by (not “over”) a WAN, wherein each LAN is located entirely in a separate and distinct geographic region. Applicants therefore submit that Shaffer, Tester, and Schneider, alone or in combination, fail to disclose or suggest at least one LAN bridged

over a WAN by interconnecting the first LAN segment in a first geographic region with a second LAN segment in a second geographic region.

Accordingly, because the combination of Shaffer, Tester, and Schneider fails to teach or suggest the subject matter of independent claims 1 and 15, it is respectfully submitted that the rejection of dependent claims 2, 5-9, 16-17 and 20-21 as unpatentable over Shaffer in view of Tester and Schneider should be withdrawn.

Claims 3-4 and 18-19 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Shaffer in view of Tester and Schneider as applied to claim 1 or 15 above, and further in view of U.S. Patent Application Publication No. 2002/0160810 to Glitho et al., (hereinafter, "Glitho"). This rejection is respectfully traversed.

Claims 3-4 depend from claim 1 and claims 18-19 depend from claim 15. As stated above with regard to the rejection of claims 1 and 15 being made unpatentable over Shaffer in view of Tester and Schneider, the combination of Shaffer, Tester and Schneider fails to disclose or suggest a LAN that is bridged over a WAN by interconnecting the first LAN segment in a first geographic region with a second LAN segment in a second geographic region. Glitho likewise lacks such disclosure or suggestion. Glitho is instead directed to an intelligent network service control point and method of implementing user services utilizing call processing language scripts. Thus, Glitho fails to bridge the substantial gap existing between the claimed subject matter and the combination of Shaffer, Tester and Schneider. Accordingly, it is respectfully submitted that the rejection of claims 3-4 and 18-19 as being unpatentable over the

combination Shaffer in view of Tester and Schneider in further view of Glitho should be withdrawn.

Claims 10-14 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Shaffer in view of Tester and Schneider as applied to claim 9, and further in view of U.S. Patent No. 6,976,087 to Westfall et al., (hereinafter, "Westfall"). This rejection is respectfully traversed.

Claims 10-14 depend from claim 1. As stated above with regard to the rejection of claim 1 being made unpatentable over Shaffer in view of Tester and Schneider, the combination of Shaffer, Tester and Schneider fails to teach or suggest a LAN that is bridged over a WAN by interconnecting the first LAN segment in a first geographic region with a second LAN segment in a second geographic region. Westfall likewise lacks such teaching or suggestion. Westfall is instead directed to a method and apparatus for configuring packet data networks to supply services to users. One embodiment automatically deploys services onto a network of routers in order to satisfy the requirements of offered service. Thus, Westfall fails to bridge the substantial gap existing between the claimed subject matter and the combination of Shaffer, Tester and Schneider. Accordingly, it is respectfully submitted that the rejection of claims 10-14 as being unpatentable over the combination Shaffer in view of Tester and Schneider in further view of Westfall should be withdrawn.

Claims 22-23 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Shaffer in view of Tester, Schneider, and Westfall and U.S. Patent Application

Publication No. 2002/0165972 to Chien et al., (hereinafter, "Chien"). This rejection is respectfully traversed.

Claims 22 and 23 include similar patentable aspects recited in claim 1 that are not taught by Shaffer, Tester, Schneider, Westfall and Chien. Claim 22 recites a method for routing packets between geographically separate redundant telephony call processing hosts. Similarly, claim 23 recites a method for allocating network addresses and subnet masks to a pair of geographically separate telephony call processing hosts. Both claims 22 and claim 23 have been amended to clarify that a LAN that is bridged over a WAN by interconnecting the first LAN segment located in a first geographic region with a second LAN segment located in a second geographic region. Support for the amendment is found, for example, on page 4, lines 4-11 in the present application, which states that two LAN sides (e.g., segments) may be interconnected over a WAN, such that, together, they still form a single LAN. As stated above with regard to the rejection of claim 1 being made unpatentable by Shaffer in view of Tester, Schneider, and Westfall, applicants submit that the combination of Shaffer, Tester, Schneider, and Westfall fails to teach or suggest a geographically distributed LAN, much less a WAN that is used to communicatively bridge the different segments of the same LAN. Chien likewise lacks such teaching or suggestion. Chien is instead directed to a method and apparatus for reducing traffic over a communication link used by a computer network. Thus, Chien fails to bridge the substantial gap existing between the claimed subject matter and the combination of Shaffer, Tester, Schneider, and Westfall. Accordingly, it is respectfully submitted that the rejection of claims 22 and 23 as unpatentable over the

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combination Shaffer in view of Tester, Schneider, Westfall, and Chien should be withdrawn

### CONCLUSION

In light of the above amendments and remarks, it is respectfully submitted that the present application is now in proper condition for allowance, and an early notice to such effect is earnestly solicited.

If any small matter should remain outstanding after the Patent Examiner has had an opportunity to review the above Remarks, the Patent Examiner is respectfully requested to telephone the undersigned patent attorney in order to resolve these matters and avoid the issuance of another Official Action.

### DEPOSIT ACCOUNT

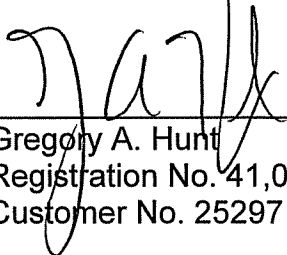
The Commissioner is hereby authorized to charge any fees associated with the filing of this correspondence to Deposit Account No. 50-0426.

Respectfully submitted,

JENKINS, WILSON, TAYLOR & HUNT, P.A.

Date: September 28, 2009

By: \_\_\_\_\_

  
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